



Attorney's Docket No. 029150-115

UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent Application of)
Jelle Wiersma) Confirmation No.: 4299
Application No.: 10/028,333) Group Art Unit: 2854
Filed: December 28, 2001) Examiner: Wasseem Y. Hamdan
For: SYSTEM FOR GENERATING) Appeal No.:
PRINTED MAIL PIECES AND)
COMPUTER PROGRAM CODE)
THEREFOR)

APPEAL BRIEF

Mail Stop APPEAL BRIEF – PATENTS

Date: April 11, 2005

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

This appeal is from the decision of the Examiner dated September 10, 2004 (Paper No. 08182004), rejecting claims 1-23, which are reproduced as the Claims Appendix of this brief. In addition, a copy of Figures 1 and 2 are attached in a Drawing Appendix.

A check covering the \$250.00 (2402) \$500.00 (1402)
 Government fee is filed herewith.
 Charge \$250.00 (2402) \$500.00 (1402) to Credit Card. Form PTO-2038 is attached.

The Commissioner is hereby authorized to charge any appropriate fees under 37 C.F.R. §§1.16, 1.17, and 1.21 that may be required by this paper, and to credit any overpayment, to Deposit Account No. 02-4800.

04/12/2005 MBIZUNES 00000043 10028333

01 FC:1402

500.00 OP

VA 719287.2

Table of Contents

	Page
I. Real Party in Interest.....	2
II. Related Appeals and Interferences	2
III. Status of Claims	2
IV. Status of Amendments.....	2
V. Summary Claimed Subject Matter.....	2
VI. Grounds of Rejection to be Reviewed on Appeal.....	6
VII. Applicant's Arguments Against the Rejection of the Claims	6
VIII. Conclusion	15

Appendix A – Appealed Claims

Appendix B – Figures 1 and 2

I. Real Party in Interest

The present application is assigned to Neopost Industrie B.V. who is the real party in interest.

II. Related Appeals and Interferences

There are no known currently pending related appeals or interferences in the subject application.

III. Status of Claims

Claims 1-23 remain pending in the subject application and are now being appealed.

IV. Status of Amendments

No amendments have been made to claims 1-23 subsequent to the rejection dated September 10, 2004.

V. Summary Claimed Subject Matter

The invention relates to a system for generating printed mail pieces, starting from a print file, and to a computer program code for controlling a control unit of such a system. (page 1, lines 3-5)

It is an object of the invention to provide a solution which makes it possible that the processing code for processing the rough print file for controlling a printer into the processed print file with data for controlling a printer and a processing device for processing printed material into mail pieces to be sent, be adapted in a simple manner to greatly different and unforeseen requirements without necessitating a sizeable processing code and a complex and laborious user interface. (page 2, lines 18-24)

The system according to FIG. 1 is made up of a printer 1 for printing postal items, a processing device 2 for processing printed postal items into mail pieces; and a control unit 3 for controlling the printer 1 and the processing device 2. (page 5, lines 6-9)

The printer is provided with a printer control 4 for controlling the print engine and the supply, feed-through and delivery functions of the printer in accordance with control instructions received from the control unit 3. The processing device 2 according to this example is made up of an inserter station 5 for enveloping documents in envelopes, and an assembly, located upstream of the inserter station 5, consisting of a transport unit 6 which carries two insert feeder stations 7, 8 and a folding station 9. The inserter station 5 is provided with a processing control unit 10 for controlling the processing of documents by the inserter station 5 and by the stations 7-9 on the transport unit 6 in accordance with control instructions received from the control unit 3. The processing control unit 10 is connected with a control unit 11 of the transport unit 6 which communicates with control units 12, 13, 14 of the stations 7-9. The control units 10-14 of the processing device 2 are arranged for distributing, in accordance with the processing instructions coming from the control unit 3, processing instructions and sequence information to the control units 10 and 12-14 of the stations, so that the correct processing operations are executed on the correct documents. (page 5, lines 10-25)

The control unit 3 is provided with an interface 15 coupled to a network 36 for inputting a rough print file for controlling a printer. This print file, in the form in which it is supplied, does not need to be suitable to control the printer 1 directly, but does contain data which at least partly define one or more documents to be printed. The control unit 3 is further provided with a processor 16 for processing the rough print file in accordance with processing instructions into a processed print file, and an interface 17 connected with the printer 1 and with the processing device 2 for transmitting control signals to the printer 1 and the processing device in accordance with the processed print file. (page 5, lines 28 through page 6, line 7)

The control unit 3 further includes a memory in the form of a hard disk on which software has been installed and working memory of the processor 16.

Contained in the memory is processing code 19 (see FIG. 2) for controlling the control unit 3 for processing the rough print file 20 into a processed print file 21. Further contained in the memory 18 is representation code 23-25 for causing the processing instructions to be represented in humanly perceptible form. This representation code is editable for changing the representations of the processing instructions and is convertible into processing code 19 by means of a conversion operation 37. (page 6, line 26 through page 7, line 4)

The representation codes 23-25 according to the present example form part of a file 26 and each form a set of instructions in the form of a script. These scripts each form a job setting, i.e. a combination of instructions applying to the assembly of a series of mail pieces. By means of selection code 27, a window with options is presented to a user on a display in the form of a viewing screen 28 (FIG. 1) which is connected with the control unit 3. After a user (this is generally not the person who has composed the scripts) has entered a choice via a keyboard 35, the selected script, in this case script no. 3, is processed by the converter 19 into active processing code 19 with which the processes "parameter preparation" 28 and "processing and transformations" 29 are controlled. (page 7, lines 12-22)

The processing phase "parameter preparation" 28 concerns processing the rough printing instructions 20 in accordance with the processing instructions 19 into a set of printing instructions 30 with prepared parameters. (page 7, lines 23-26)

During the processing phase "processing and transformations", the intermediate file 30 is further processed into a file which indicates for each specimen of the mail pieces to be assembled from which of the insert feeding stations 7, 8 inserts are to be supplied, or not. During this phase, transformations can take place as well. Thus, the order of the mail items in the file 30 can be changed, for instance on the basis of address data obtained from the documents, to obtain a sorting which makes it possible to present the mail pieces in presorted condition to, for instance, the postal services. (page 8, lines 6-13)

The processing code is obtained according to the present example by processing a script code 22 being processed. In order to make this possible in a simple manner, there is provided a code generator 32 for generating the

representation code 22. This code generator constitutes a setting dialog code 32 which presents a user interface with options from predetermined subsets of processing instructions and which offers the possibility of filling in parameter values. These subsets are stored as basic components in a file 33 and, in response to choices entered with the aid of the user interface of the setting dialog 32, are included in the script code being processed 22. The file 33 provides a set of processing subroutines with which representation codes for causing the processing instructions to be represented in humanly perceptible form can be composed which differ from each other at least as regards processing instructions included therein and which are each convertible to a processing code corresponding with that representation code for controlling the control unit 3 to process the rough print file 20 into a processed print file 21. (page 8, line 20 through page 9, line 5)

The file of basic components 33 is also consulted during conversion of a script by the conversion operation 37 in response to references, found in the script, to basic components in that file 33. The basic components can also include instructions in the form of parts of script, in which case in response to selection of those basic components those parts of script are included in the script code being processed 22. For executing the processing operations according to those parts of script, the converter does not need to consult the file 33 with basic components. (page 9, lines 10-17)

When the settings that can be set via the setting dialog 32 have been set, the script code being processed 22 can be shown and edited with the aid of script editing code 34. The script editing code 34 is preferably a word processor with provisions for the shortened input and check of script, but also a word editing program can be used as script editing code 34. Next, with the aid of the script, processing operations can be added which cannot be obtained by means of the setting dialog 32. In particular, processing instructions and in particular variables, including formal parameters, are represented and it is made possible to edit these in order to enter other variables, including other formal parameters, to change processing operations and to enter new processing operations. (page 9, lines 18-28)

When a script code being processed 22 is ready, it can be stored as part of the file 26 from which a script can be selected in accordance with which the processing of a print file is to be executed. (page 10, lines 1-3)

The processed print file has now been adapted for controlling the printer 1 and the processing device 2 In a very simple manner, this script can be changed, for instance for adding an algorithm which determines the postcode with the aid of an external file and adds it and then an algorithm which on the basis of any desired selection from and/or ordering of the postcodes, carries out processing operations on the print file. (page 12, lines 34-39)

VI. Grounds of Rejection to be Reviewed on Appeal

The issues presented for review by the Board of Patent Appeals and Interferences are:

- 1) whether claims 1-4, 7, 19, 21 and 23 were properly rejected under 35 U.S.C. §102(b) as being anticipated by *Axelrod et al.* (U.S. Patent No. 4,800,505); and
- 2) whether claims 5-16, 18, 20 and 22 were properly rejected under 35 U.S.C. §103 as being unpatentable over *Axelrod et al.*

VII. Applicant's Arguments Against the Rejection of the Claims

A. Rejection of Claims 1-4, 17, 19, 21 and 23 Under 35 U.S.C. §102(b)

Applicant respectfully submits that *Axelrod et al.* does not show, teach or suggest processing a rough print file in accordance with processing instructions into a processed print file, the processed print file comprising instructions for controlling the printer and the processing device in which a memory contains representation code for causing the processing instructions to be represented in humanly interpretable form, the representation code being edible by an operator of the system for changing at least the representation of the processing instructions and the representation code being convertible into an accordingly changed version of the processing code as claimed in claims 1, 17 and 23.

Axelrod et al. appears to disclose in FIG. 1 a mail preparation system which includes a control document printing system 2 and an inserter system 4. System 2 comprises a conventional electronic data processing system 10 which controls a conventional line printer 20 to print batches of control documents such as utility bills, bank statements, etc. in the form of fan fold computer printout 30. (col. 3, line 64 through col. 4, line 2) Data processing system 10 is also programmed to generate records associated with selected values of identification codes and to print selected values of the identification codes on each control document in the form of dash code; which is preferably printed on the sprocket strips of the fan fold computer printout paper. Each record includes the particular value of the identification code selected, and may include, but is not limited to, dash code information for controlling an inserter, zip code information, classification pointer codes to be printed on components of an item to be mailed which are intended to be returned to the mailer (e.g. business return envelopes), and, where the identification code identifies the control documents uniquely, address information. These records are transmitted to inserter system 4 for use in further preparation of items to be mailed in a manner which will be described further below. Communications link 40 may be any of a number of well known techniques for the communications of digital data. (col. 4, lines 5-25)

Data processing system 10 may be formed by modification of existing data processing system programmed to produce control documents for use in conventional dash code controlled inserter systems by the addition of a post-processor subsystem which intercepts the control signals from system 10 to line printer 20 before they are transmitted and modifies them by removing the dash code and substituting an identification code before retransmitting the modified signals to line printer 20. The post-processor subsystem also generates the appropriate records associated with particular values of the identification codes, as described above, and transmits these to inserter system 4 over communication link 40. Operation of such a post-processor subsystem will be described in more detail below. Printout 30 is then physically transported to inserter system 4 for further preparation. Printout 30 is separated into discrete control documents and by

conventional burster 50, which includes conventional scanner 52. Since control documents cd are physically identical to prior art control documents the separating and scanning operations carried out by burster 50 and scanner 52 are identical to those known in the prior art; except that scanner 52 transmits the identification code information to computer system 60, which controls the operation of inserter 4. (col. 4, lines 30-55)

Computer system 60 comprises processor 62, data base 64, operator interface 66, which may be a conventional keyboard and display, and conventional I/O device 68, which may be a conventional tape drive or floppy disc drive. Computer 60 also communicates with electronic scale 70 to receive information for determining the weights of inserts. (col. 4, lines 59-65) Computer system 60 receives the identification code information from control document cd and accesses the associated record, preferably randomly, stored in data base 64. System 60 then generates control signals to control inserter 80 and other subsystems as will be described more fully below. After separation, control document cd is transported through conventional inserter system 80. Inserter system 80 comprises a plurality of insert feed stations 82 and an inserter station 84. At each of stations 82 an insert may be assembled with control document cd in response to control signals from processor 62. At inserter station 84 the components of an item to be mailed are assembled by insertion of the inserts and the control document into an envelope to form item i. (col. 5, lines 3-18) After insertion item i is transported through conventional printer 90 which operates under the control of processor 62. In one embodiment of printer 90 may be a conventional bar code printer which is controlled to print the appropriate zip code in bar code format on item i. In another embodiment printer 90 may be a conventional character printer which is controlled to print the address on item i. After printer 90, item i is transported through conventional electronic postage meter 100, such as the model number 6500 marketed by Pitney Bowes Inc. of Stamford, Conn., which is controlled by processor 62 to frank item i with indicia corresponding to the appropriate postage amount. (col. 5, lines 36-52) FIG. 2 shows a flow chart of the operation of computer system 60. To initialize the system an operator first places a known number of inserts to be inserted in items to

be mailed by inserter 80 on scale 70 and issues a start up command through operator interface 66. At 200 processor 62 will set all values for the weight of inserts to zero. At 202 the operator enters the number of inserts on scale 70 and the particular insert station 82 for which they are intended. At 204 processor 62 receives the total weight of the inserts from scale 70. At 206 processor 62 computes the weight of the inserts and sets the insert weight for the identified station equal to that weight. At 208 processor 62 tests to determine if that was the last insert to be weighed. If not it returns to 202 to determine the next insert weight. If it is the last insert weight the operator enters additional set-up information such as class of service or known insert weights, if necessary, and at 210 processor 62 exits. Preferably the weight of the inserts is computed by determining the average weight and adding corrections for the error of scale 70 and variance in the insert weight to assure that no insert weighs more than the computed weight. At sometime prior to further preparation of the items to be mailed data processing system 10 will transmit records for the items to be mailed to processor 62 over communications link 40. Using well known conventional data base management techniques processor 62 will store these records in data base 64. As the next step in preparation of the items to be mailed printout 30 will be delivered to inserter system 4. Once the operator has properly attached printout 30 to burster 50 he may enter a start command through interface 66 and at 220 processor 62 waits for the first identification code to be transmitted by scanner 52. At 222 processor 62 fetches the record corresponding to the received identification code. At 224 processor 62 computes the total weight for the item to be mailed using the weights determined in the above described initialization routine and the dash code information defining which inserts are to be assembled in that item. At 226 the processor accesses an appropriate previously stored postal rate chart to determine the appropriate postage amount in accordance with the weight of the item to be mailed. At 228 processor 62 outputs dash code information to inserter 80 to control assembly of the item to be mailed. At 230 processor 62 controls print mechanism 86 to print a machine readable classification pointer code, determined from the record fetched at 222, on an insert such as a business return envelope to be inserted in the item to be mailed. At 232 processor

62 controls printer 90 to print address information determined from the record fetched at 222 on the item to be mailed. Similarly, at 234 processor 62 controls printer 90 to print zip code information in bar code form on the item to be mailed. At 236 processor 62 sets meter 100 to the postage amount determined at 224; or alternatively, selects the appropriate one of a plurality of preset meters. At 238 processor 62 tests 70 determine if that was the last item to be mailed. If not, it returns to 222, and if so it exits. (col. 6, lines 9-68) In a preferred embodiment of the subject invention records for items to be mailed stored in data base 64 may be updated using well known conventional data base management techniques using either update information transmitted from data processing system 10 or input through I/O devices 66 and/or 68. (col. 7, lines 27-32)

Thus, *Axelrod et al.* merely discloses a system 2 which comprises a conventional electronic data processing system 10 which controls a conventional line printer 20 to print batches of control documents (col. 3, line 66 through col. 4, line 2) and which may optionally be modified to remove dash code and substitute identification code from signals, before the signals are sent to the printer 20, to generate appropriate records associated with particular values of the identification codes and to transmit these to the inserter system (col. 4, lines 30-42). Nothing in *Axelrod et al.* shows, teaches or suggests editability of processing code for controlling the interception of dash codes and the replacement of the intercepted dash codes by identification codes. Also, nothing in *Axelrod et al.* shows, teaches or suggests a) representation code for causing processing instructions of the processing code for controlling the processing of a rough print file into a processed print file to be presented in humanly interpretable form, b) the representation code being editable for changing at least representations of the processing instructions and c) the edited representation code being convertible into an accordingly changed version of the processing code, as claimed in claims 1, 17 and 23.

Also, *Axelrod et al.* merely discloses at column 6, lines 37-68 fetching information and controlling a printer to print a machine readable classification pointer code and print address information from records fetched. Thus nothing in *Axelrod et al.* shows, teaches or suggests causing processing instructions to be represented in

humanly interpretable form as claimed in claims 1, 17 and 23. Secondly, the information that is printed represents mailing information and not processing instructions which are used to process a rough print file into a processed print file as claimed in claims 1, 17 and 23.

Furthermore, *Axelrod et al.* merely discloses a computer system 60 which communicates with electronic scale 70 to receive information for determining the weights of inserts (col. 4, lines 63-65). Nothing in the recited passage shows, teaches or suggests processing a rough print file which defines at least one document to be printed as claimed in claims 1, 17 and 23. Rather, *Axelrod et al.* merely discloses an electronic scale 70 which outputs information for determining the weights of inserts.

Also, *Axelrod et al.* merely discloses that at step 204 the processor 62 receives the total weight of the inserts from the scale 70 and computes the average weights and adds corrections for errors of the scale (col. 6, lines 17-30). Nothing in the recited passage shows, teaches or suggests processing a rough print file into a processed print file comprising instructions for controlling the printer and the processing device which processes printed postal items into mail pieces as claimed in claims 1, 17 and 23. Rather, *Axelrod et al.* merely discloses computing the weights of the inserts.

Additionally, *Axelrod et al.* merely discloses a scanner 52 which transmits an identification code information to computer system 60 which controls the operation of inserter 4 (col. 4, lines 53-55). Thus nothing in the recited passage shows, teaches or suggests processing a rough print file which partially defines at least one document to be printed, into a processed print file comprising instructions for controlling the printer and the processing device as claimed in claims 1, 17 and 23. Rather, *Axelrod et al.* at column 4, lines 53-55 merely discloses controlling the operation of only an inserter 4 based on identification code information from scanner 52.

Finally, Applicant respectfully traverses the Examiner's statement that *Axelrod et al.* discloses a system that is capable of performing the same exact functions even though the functional language recited in the claims is not word for word taught by

Axelrod et al. As stated in In re Alappat, 31 U.S.P.Q.2d 1545, 1558, a general purpose computer in effect becomes a special purpose computer once it is programmed to perform particular functions pursuant to instructions from program software.

For all of the above stated reasons, Applicant respectfully submits that the rejections to claims 1-4, 17, 19, 21 and 23 is in error. Therefore, Applicants respectfully request the Board of Patent Appeals and Interferences reverses the rejection to the claims under 35 U.S.C. §102(b).

B. Rejection of Claims 5-16, 18, 20 and 22 Under 35 U.S.C. §103

Applicant respectfully submits that *Axelrod et al.* does not show, teach or suggest processing a rough print file in accordance with processing instructions into a processed print file, the processed print file comprising instructions for controlling the printer and the processing device in which a memory contains representation codes for causing the processing instructions to be represented in humanly interpretable form, the representation codes being edible by an operator of the system for changing at least the representations of the processing instructions and each representation code being convertible into a processing code as claimed in claims 9 and 18.

Thus, *Axelrod et al.* merely discloses a system 2 which comprises a conventional electronic data processing system 10 which controls a conventional line printer 20 to print batches of control documents (col. 3, line 66 through col. 4, line 2) and which may optionally be modified to remove dash code and substitute identification code from signals, before the signals are sent to the printer 20, to generate appropriate records associated with particular values of the identification codes and to transmit these to the inserter system (col. 4, lines 30-42). Nothing in *Axelrod et al.* shows, teaches or suggests editability of processing code for controlling the interception of dash codes and the replacement of the intercepted dash codes by identification codes. Also, nothing in *Axelrod et al.* shows, teaches or suggests a) representation code for causing processing instructions of the processing code for controlling the processing of a rough print file into a processed print file to be presented in humanly interpretable form, b) the representation code

being editable for changing at least representations of the processing instructions and c) the edited representation code being convertible into an accordingly changed version of the processing code, as claimed in claims 9 and 18.

Also, *Axelrod et al.* merely discloses at column 6, lines 37-68 fetching information and controlling a printer to print a machine readable classification pointer code and print address information from records fetched. Thus nothing in *Axelrod et al.* shows, teaches or suggests causing processing instructions to be represented in humanly interpretable form as claimed in claims 9 and 18. Rather, the information that is printed represents mailing information and not processing instructions which are used to process a rough print file into a processed print file as claimed in claims 9 and 18.

Furthermore, *Axelrod et al.* merely discloses a computer system 60 which communicates with electronic scale 70 to receive information for determining the weights of inserts (col. 4, lines 63-65). Nothing in the recited passage shows, teaches or suggests processing a rough print file which defines at least one document to be printed as claimed in claims 9 and 18. Rather, *Axelrod et al.* merely discloses an electronic scale 70 which outputs information for determining the weights of inserts.

Also, *Axelrod et al.* merely discloses that at step 204 the processor 62 receives the total weight of the inserts from the scale 70 and computes the average weights and adds corrections for errors of the scale (col. 6, lines 17-30). Nothing in the recited passage shows, teaches or suggests processing a rough print file, which partially defines at least one document to be printed, into a processed print file comprising instructions for controlling the printer and the processing device which processes printed postal items into mail pieces as claimed in claims 9 and 18. Rather, *Axelrod et al.* merely discloses computing the weights of the inserts.

Furthermore, *Axelrod et al.* merely discloses a scanner 52 which transmits an identification code information to computer system 60 which controls the operation of inserter 4 (col. 4, lines 53-55). Thus nothing in the recited passage shows, teaches or suggests processing a rough print file which partially defines at least one document to be printed, into a processed print file comprising instructions for

controlling the printer and the processing device as claimed in claims 9 and 18. Rather, *Axelrod et al.* at column 4, lines 53-55 merely discloses controlling the operation of only an inserter 4 based on identification code information from scanner 52.

Applicant respectfully submits that the Examiner is only selecting bits and pieces of the reference without considering the remaining teachings of that reference which would lead away from the claimed invention. As the courts have stated in In re Wesslau, 147 U.S.P.Q. 391, 393 (CCPA, 1963) quoted with approval in In re Hedger, 228 U.S.P.Q. 685, 687 (CAFC, February 1986):

"It is impermissible within the framework of 35 U.S.C. §103 to pick and choose from any one reference only so much of it as will support a given position, to the exclusion of the other parts necessary to the full appreciation of what such reference fairly suggest to one of ordinary skill in the art."

As stated in the Court of Appeals for the Federal Circuit in Gore v. Garlock, 220 U.S.P.Q. 303, 312-313 (CAFC 1983), cert denied:

To imbue one of ordinary skill in the art with knowledge of the invention in suit, when no prior art reference or references of record convey or suggest that knowledge, is to fall victim to the insidious effect of a hindsight syndrome wherein that which only the inventor taught is used against its teacher.

Of course it is difficult after having the full advantage of Applicant's teachings to ignore the Applicant's teachings and to rely upon the teachings of the references. However, as difficult as this may be, 35 U.S.C. §103 requires that obviousness be determined "at the time the invention was made". In addition, CCPA and CAFC mandates in applying 35 U.S.C. §103 that the judgment of

Obviousness cannot be established...absent some teaching or suggestion supporting the combination ACS Hospital Systems, Inc. v. Monefior Hospital et al., 221 U.S.P.Q. 929, 933 (CAFC, 1984).

It is impermissible...to pick and choose from any one reference only so much of it as will support a given position to the exclusion of the other parts. In re Wesslau, In re Hedger, *supra*.

Since the reference does not show, teach or suggest the invention as claimed in claims 5-16, 18, 20 and 22, Applicant respectfully requests that the Board of Patent Appeals and Interferences reverses the rejection of the claims under 35 U.S.C. §103.

For all of the above stated reasons, Applicant respectfully submits that the rejections to claims 1-4, 17, 19, 21 and 23 is in error. Therefore, Applicants respectfully request the Board of Patent Appeals and Interferences reverses the rejection to the claims under 35 U.S.C. §102(b).

VIII. Conclusion

For all of the above stated reasons, Applicant respectfully requests the Honorable Board of Patent Appeals and Interferences reverses the Examiner's decision in this application since Applicants respectfully submit that the rejection of claims 1-23 is in error.

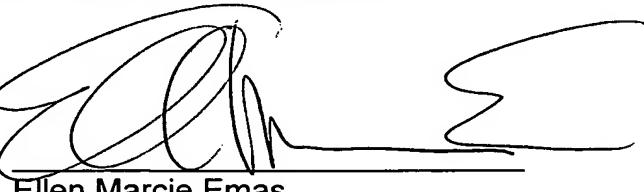
In the event that this paper is not timely filed within the currently set shortened statutory period, Applicants respectfully petition for an appropriate extension of time. The fees for such extension of time may be charged to our Deposit Account No. 02-4800.

In the event that any additional fees are due with this paper, please charge
our Deposit Account No. 02-4800.

Respectfully submitted,

Burns, Doane, Swecker & Mathis, L.L.P.

By:



Ellen Marcie Emas
Registration No. 32,131

P.O. Box 1404
Alexandria, Virginia 22313-1404
(703) 836-6620

CLAIMS - APPENDIX A



TheAppealed Claims

1. A system for generating printed mail pieces, starting from a print file, comprising:
 - a printer for printing postal items;
 - a processing device for processing printed postal items into mail pieces, the processing device comprising at least one mechanical device for mechanically acting upon said printed postal items;
 - a control unit for controlling the printer and the processing device, comprising
 - an input interface for inputting a rough print file for controlling the printer, wherein the rough print file at least partly defines at least one document to be printed,
 - a processor for processing the rough print file in accordance with processing instructions into a processed print file, the processed print file comprising instructions for controlling the printer and the processing device,
 - an output interface connected with said printer and with said processing device for transmitting control signals to at least said printer or said processing device for controlling said printer and said processing device in accordance with, or formed by, said processed print file, and
 - memory containing:
 - processing code for controlling said control unit for processing said rough print file into the processed print file, which processing code comprises processing instructions; and
 - representation code for causing said processing instructions to be represented in humanly interpretable form, said representation code being editable by an operator of said system for changing at least said representations of said processing instructions, and said representation code being convertible into an accordingly changed version of said processing code.
2. A system according to claim 1, wherein said processing instructions include variables and wherein said representation code is arranged for editably representing at least variables of said processing instructions.

3. A system according to claim 1, wherein said processing instructions include formal parameters and wherein said representation code is arranged for editably representing at least formal parameters of said processing instructions.

4. A system according to claim 1, further comprising a display for representing said representation code in humanly interpretable form, said display being connected with said control unit.

5. A system according to claim 1, wherein said representation code is arranged for representing said processing instructions in a source language.

6. A system according to claim 5, wherein said source language is a script language.

7. A system according to claim 5, wherein said memory further contains converter code for converting said source language into a code executable by said control unit.

8. A system according to claim 5, wherein said editing code comprises a code generator for generating at least portions of said representation code, which code generator is arranged for causing a user interface to be represented, with choices from predetermined sets of processing instructions.

9. A system for generating printed mail pieces, starting from a print file, comprising:

 a printer for printing postal items;

 a processing device for processing printed postal items into mail pieces, the processing device comprising at least one mechanical device for mechanically acting upon said printed postal items;

 a control unit for controlling the printer and the processing device, comprising

 an input interface for inputting a rough print file for controlling a printer, wherein the rough print file at least partly defines at least one document to be printed,

a processor for processing the rough print file in accordance with processing instructions into a processed print file, the processed print file comprising instructions for controlling the printer and the processing device,

an output interface connected with said printer and with said processing device for transmitting control signals to at least said printer or said processing device for controlling said printer and said processing device in accordance with, or formed by, said processed print file, and

memory containing:

a set of processing subroutines with which processing subroutines representation codes for causing said processing instructions to be represented in humanly interpretable form can be composed, which representation codes differ from each other at least as regards processing instructions included therein, are editable by an operator of said system for changing at least said representations of said processing instructions, and are each convertible into a_processing code, corresponding with the respective representation code, for controlling said control unit for processing said rough print file into said processed print file, the processed print file comprising instructions for controlling the printer and the processing device.

10. A system according to claim 9, wherein said processing instructions include variables and wherein said representation code is arranged for causing at least variables of said processing instructions to be editably represented.

11. A system according to claim 9, wherein said processing instructions include formal parameters and wherein said representation code is arranged for causing at least formal parameters of said processing instructions to be editably represented.

12. A system according to claim 9, further comprising a display for representing said representation code in humanly interpretable form, said display being connected with said control unit.

13. A system according to claim 9, wherein said representation code is arranged for representing said processing instructions in a source language.

14. A system according to claim 13, wherein said source language is a script language.

15. A system according to claim 13, wherein said memory further contains converter code for converting said source language into a code executable by said control unit.

16. A system according to claim 13, wherein said editing code comprises a code generator for generating at least portions of said representation code, which code generator is arranged for causing a user interface to be represented, with choices from predetermined sets of processing instructions.

17. A computer readable medium containing a computer program code for controlling a control unit for controlling a printer and a processing device for processing printed postal items into postal sets, the processing device comprising at least one mechanical device for mechanically acting upon said printed postal items, said computer program code comprising:

processing code for controlling said control unit for processing a rough print file for controlling a printer into a processed print file for controlling the printer and the processing device for processing printed postal items into mail pieces, which processing code comprising processing instructions, and

representation code for causing said processing instructions to be represented in humanly interpretable form, the representation code being editable by an operator of a system comprising said printer and said processing device for changing at least the representations of said processing instructions, and said representation code being convertible into an accordingly changed version of said processing code.

18. A computer readable medium containing a computer program code for controlling a control unit for generating processing codes for controlling a control unit for processing a rough print file for controlling a printer into a processed print file for controlling the printer and a processing device for processing printed postal items into mail pieces, the processing device comprising at least one mechanical device

for mechanically acting upon said printed postal items, said computer program code comprising:

 a set of processing subroutines, with which processing subroutines representation codes for causing processing instructions to be represented in humanly interpretable form can be composed which representation codes differ from each other at least as regards processing instructions included therein, are editable by an operator of a system comprising said printer and said processing device for changing at least said representations of said processing instructions, and are each convertible into a processing code corresponding with the respective representation code, for controlling said control unit for processing said rough print file into said processed print file, the processed print file comprising instructions for controlling the printer and the processing device.

19. A system according to claim 1, wherein the at least one mechanical device includes at least one of an inserter device, an insert feeder device and a folding device.

20. A system according to claim 9, wherein the at least one mechanical device includes at least one of an inserter device, an insert feeder device and a folding device.

21. A system according to claim 1, wherein the representation code is arranged to cause a subset of the processing instructions of the processing code to be editably represented.

22. A system according to claim 9, wherein the representation code is arranged to cause a subset of the processing instructions of the processing code to be editably represented.

23. A system for generating printed mail pieces, comprising:

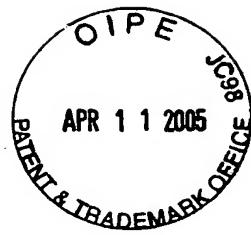
 printing means for printing postal items;

 processing means for processing printed postal items into mail pieces;

control means for controlling the printer and the processing device; and
memory means for storing:

processing code for controlling said control unit for processing said
rough print file into the processed print file, which processing code comprises
processing instructions and

representation code for causing said processing instructions to be
represented in humanly interpretable form, said representation code being editable
by an operator of said system for changing at least said representations of said
processing instructions, and said representation code being convertible into an
accordingly changed version of said processing code



FIGURES 1 AND 2 – APPENDIX B

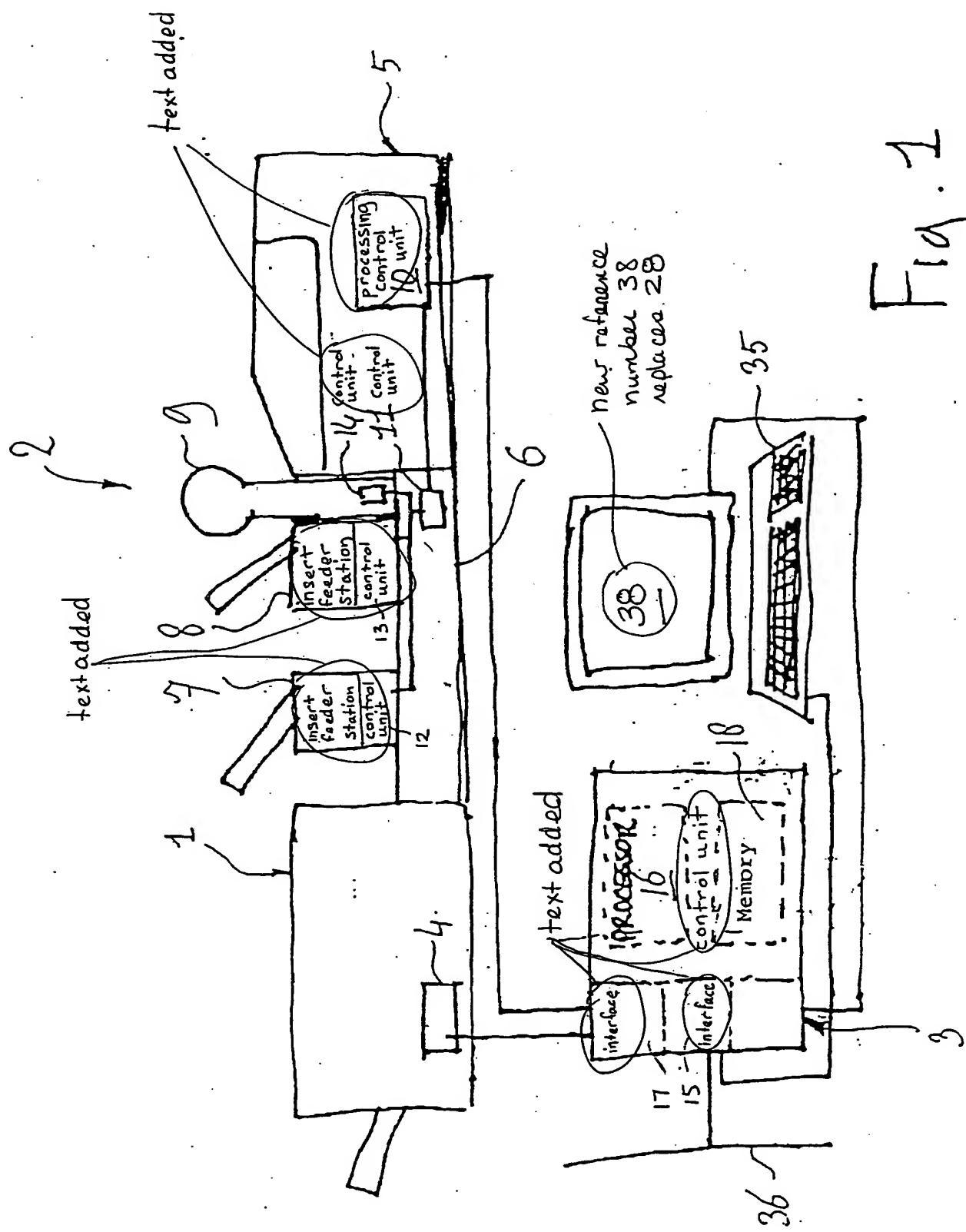


Fig. 1

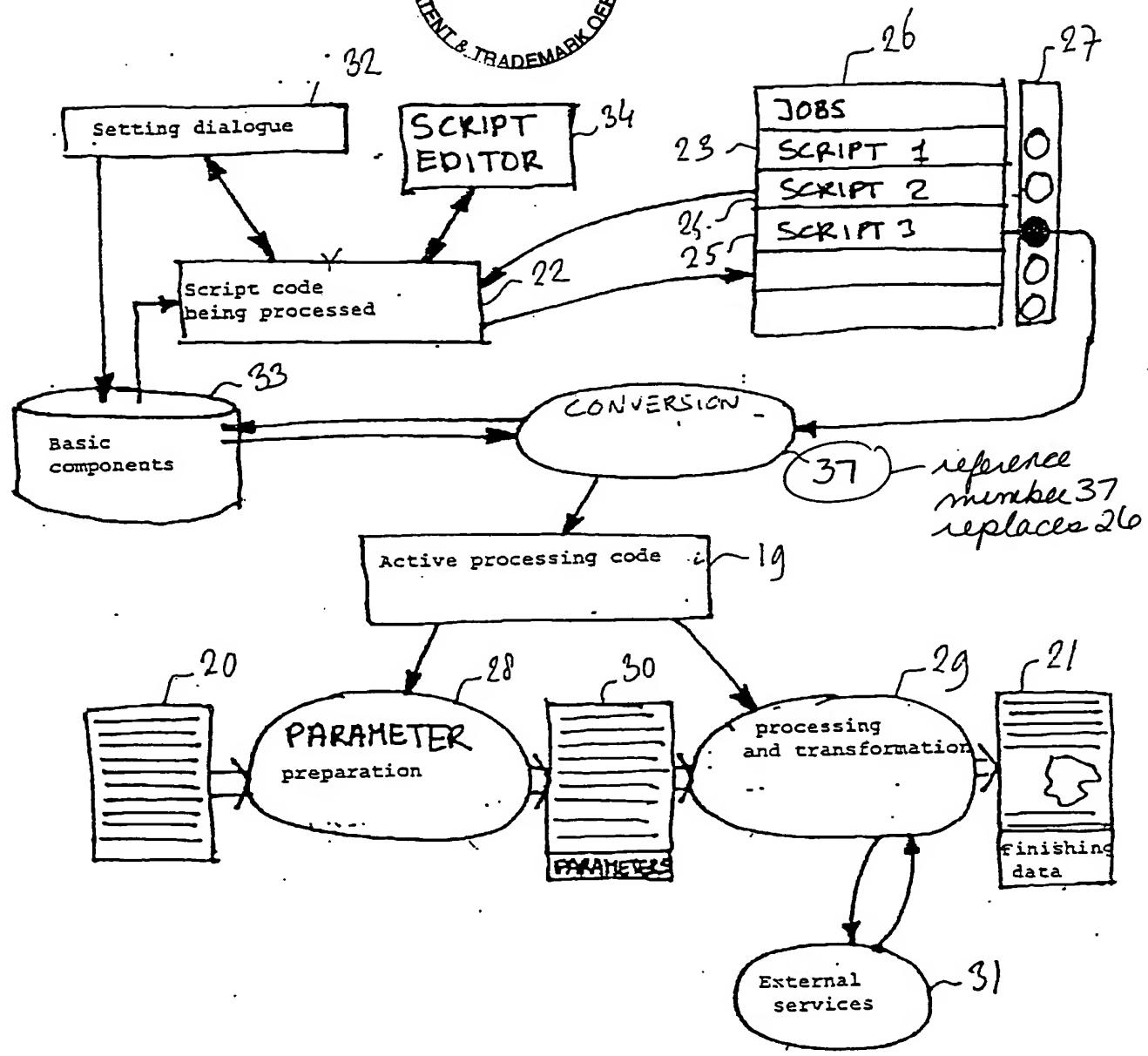


Fig. 2